



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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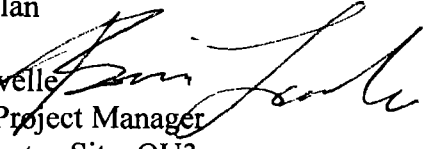

1191815 - R8 SDMS

Ref: 8EPR-SR

January 31, 2011

MEMORANDUM

SUBJECT: Review of draft Field Modification #2, Libby OU3 Phase IVA Sampling and Analysis Plan

FROM: Bonnie Lavelle 
Remedial Project Manager
Libby Asbestos Site, OU3

TO: Site File

The attached documents summarize the basis for Field Modification #2 to the Libby OU3 Phase IVA Sampling and Analysis Plan and review comments received by EPA from Remedium and their contractor, MWH.



RE: Libby OU3 - Phase IVA analytical
Kyeong Corbin to: Bonita Lavelle, 'Marriam, Robert R.'
Cc: "John Garr"
Please respond to kyeong.corbin

07/25/2010 09:57 AM

We have received the first batch of samples on Friday.

The following group of samples cannot be prepared directly due to dusty/overloaded condition:

A group of P4-00036, P4-00037 and P4-00038
A group of P4-00047, P4-00048 and P4-00049
A group of P4-00050, P4-00051 and P4-00052
A group of P4-00059, P4-00060 and P4-00061

Should we go ahead with the rest of samples?
Please let us know.

Thank you.

Kyeong
Hygeia Lab

-----Original Message-----

From: Lavelle.Bonita@epamail.epa.gov [mailto:Lavelle.Bonita@epamail.epa.gov]

Sent: Friday, July 23, 2010 4:11 PM

To: kyeong.corbin@atcassociates.com

Cc: Robert.R.Marriam@grace.com; robert.j.medler@grace.com

Subject: Libby OU3 - Phase IVA analytical

Dear Kyeong,

I understand that the first batch of OU3 samples for TEM analysis will be arriving at Hygeia today (or soon).

I'm sending this message to be sure you have the most recent version of the analytical requirements summary document and EDDs for this project.

Here they are:

(See attached file: Analytical Req Summary_OU3PHIVA-0610_rev1.doc)

(See attached file: TEM v34a_OU3.zip)

These are also posted on the OU3 webpage along with the Phase IVA Sampling and Analysis Plan. The webpage address is:

www.formationenv.com/libby
user name : libby
password: Formation2*

Please don't hesitate to contact me or Remedium if you have any questions.

Sincerely,

Bonnie Lavelle
Remedial Project Manager
Libby Asbestos Superfund Site, OU3
EPA Region 8
1595 Wynkoop Street
8EPR-SR
Denver, CO 80202-1129

(303) 312-6579
Fax (303) 312-7151

Overloading of first-round cassettes at Areas 2 and 7 at Libby OU3

John Garr

to:

Bob Medler, Bob Marriam

07/26/2010 11:16 AM

Cc:

Bonita Lavelle

[Show Details](#)

Hi Bob:

According to Kyeong, the following cassettes from the first round of Phase IV ABS at site 2 and 7 were overloaded. Here is the key to the activities/durations/flow rates that correspond to the overloaded cassettes:

P4-00036 Person 2, Pulaski Fireline, Area 2, 4 LPM, 30 mins.

P4-00037 Person 2, Pulaski Fireline, Area 2, 2 LPM, 30 mins.

P4-00038 Person 2, Pulaski Fireline, Area 2, 1 LPM, 30 mins.

P4-00047 Person 1, Felling/Limbing/Cutting/Stacking, Area 7, 4 LPM, 50 mins.

P4-00048 Person 1, Felling/Limbing/Cutting/Stacking, Area 7, 2 LPM, 50 mins.

P4-00049 Person 1, Felling/Limbing/Cutting/Stacking, Area 7, 1 LPM, 50 mins.

P4-00050 Person 2, Felling/Limbing/Cutting/Stacking, Area 7, 4 LPM, 50 mins.

P4-00051 Person 2, Felling/Limbing/Cutting/Stacking, Area 7, 2 LPM, 50 mins.

P4-00052 Person 2, Felling/Limbing/Cutting/Stacking, Area 7, 1 LPM, 50 mins.

P4-00059 Person 1, Tree thinning/Slash Pile Building, Area 7, 4 LPM, 30 mins.

P4-00060 Person 1, Tree thinning/Slash Pile Building, Area 7, 2 LPM, 30 mins.

P4-00061 Person 1, Tree thinning/Slash Pile Building, Area 7, 1 LPM, 30 mins.

In view of these results, and consistent with our discussion by phone this morning, we propose to cut the duration of each Phase IV ABS activity (with the exception of 2a., the round-trip drive out and back from the sampling location) by half.

Please call me with any questions or comments. Joan Kester is scheduled to travel to Libby today, departing at noon. Our current plan is to start work at 0800 tomorrow under this revised plan.

John

**MWH**

BUILDING A BETTER WORLD

Rocky Mountain Region**John D. Garr, P.G.****Supervising Hydrogeologist**

10619 South Jordan Gateway, Suite 100

Salt Lake City, UT 84095

Telephone: 801. 617. 3237

Facsimile: 801. 617. 4200

Mobile: 801. 201. 7438

RE: Overloading of first-round cassettes at Areas 2 and 7 at Libby OU3

Medler, Robert J.

to:

John Garr, Marriam, Robert R.

07/26/2010 01:23 PM

Cc:

Bonita Lavelle, "Gardner, Lynne G."

Show Details

John

I would agree except that Raney Creek scenario would remain the same also. John if the weather cooperates it would be nice if we could make up some of these this week.

Bonnie

MWH is going back to Libby today and anticipates starting back to work in the morning. We would like to implement these changes with your concurrence.

Bob

From: John Garr [mailto:John.D.Garr@us.mwhglobal.com]

Sent: Monday, July 26, 2010 12:16 PM

To: Medler, Robert J.; Marriam, Robert R.

Cc: Bonnie Lavelle (Lavelle.Bonita@epamail.epa.gov)

Subject: Overloading of first-round cassettes at Areas 2 and 7 at Libby OU3

Hi Bob:

According to Kyeong, the following cassettes from the first round of Phase IV ABS at site 2 and 7 were overloaded. Here is the key to the activities/durations/flow rates that correspond to the overloaded cassettes:

P4-00036 Person 2, Pulaski Fireline, Area 2, 4 LPM, 30 mins.

P4-00037 Person 2, Pulaski Fireline, Area 2, 2 LPM, 30 mins.

P4-00038 Person 2, Pulaski Fireline, Area 2, 1 LPM, 30 mins.

P4-00047 Person 1, Felling/Limbing/Cutting/Stacking, Area 7, 4 LPM, 50 mins.

P4-00048 Person 1, Felling/Limbing/Cutting/Stacking, Area 7, 2 LPM, 50 mins.

P4-00049 Person 1, Felling/Limbing/Cutting/Stacking, Area 7, 1 LPM, 50 mins.

P4-00050 Person 2, Felling/Limbing/Cutting/Stacking, Area 7, 4 LPM, 50 mins.

P4-00051 Person 2, Felling/Limbing/Cutting/Stacking, Area 7, 2 LPM, 50 mins.

P4-00052 Person 2, Felling/Limbing/Cutting/Stacking, Area 7, 1 LPM, 50 mins.

P4-00059 Person 1, Tree thinning/Slash Pile Building, Area 7, 4 LPM, 30 mins.

P4-00060 Person 1, Tree thinning/Slash Pile Building, Area 7, 2 LPM, 30 mins.

P4-00061 Person 1, Tree thinning/Slash Pile Building, Area 7, 1 LPM, 30 mins.

Cut Duration in
1/2 For
2, 3a, 3b, 3d, 3e

4 LPM	15 min	135
2 LPM	15 min	269
1 LPM	15 min	537

4 LPM	25 min	85
2 LPM	25 min	165
1 LPM	25 min	330

4 LPM	15 min	135
2 LPM	15 min	269
1 LPM	15 min	537

In view of these results, and consistent with our discussion by phone this morning, we propose to cut the duration of each Phase IV ABS activity (with the exception of 2a, the round-trip drive out and back from the sampling location) by half.

Also 3c and 1

Please call me with any questions or comments. Joan Kester is scheduled to travel to Libby today, departing at noon. Our current plan is to start work at 0800 tomorrow under this revised plan.

John



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Rocky Mountain Region

John D. Garr, P.G.

Supervising Hydrogeologist

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Mobile: 801. 201. 7438

Revised Phase IV ABS Script

John Garr

to:

Joan Kester, Bob Medler, Bob Marriam, Bonita Lavelle

07/26/2010 04:39 PM

Show Details

Hi all:

Here is the revised ABS script. Felling/Limbing "2b.1" remain at 20 minutes, but have a separate set of cassettes. Cutting/Stacking ("2.b.2") remain at 15/15 (30 mins.), with a separate set of cassettes. Activities 3a., 3b. and 3d. have each been halved to 7.5/7.5 (15 mins.). Activity 3c stands at 30 mins.

If this meets with your approval, Joan will begin implementing at 0800 tomorrow morning. If not, please let me know ASAP so I can get a message to her before she's out of cell range.

Thanks,

John



MWH

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LIBBY OU3 PHASE IV ABS SCRIPT

SCRIPT 1 Recreational Visitor Along Lower Rainy Creek

1. **30 mins.** up, switch lead/follow, **30 mins.** down lower 0.25-mile, from ER decon trailer upstream. Hike along exposed dry streambed along banks. (Late season).

SCRIPT 2 Residential Wood Harvester

- 2a. Driving to ABS area: variable duration (record), windows down (new cassettes)
- 2b.1 Felling, Limbing: **20 mins.**, Douglas fir, 8-10 in. diam. (new cassettes)
- 2b.2 Cutting, Stacking in Truck: **15 mins.**, switch, **15 mins.** (new cassettes)
- 2a. Driving Back to Flyway: variable duration, (record) re-attach same cassettes used for drive-out, windows down

No
Chance
Necess -
Clarity

SCRIPT 3 USFS Worker

- 3a. Trail Maintenance/Debris Clearing: **7.5 mins.** saw head trimmer, debris clearing, switch, repeat for **7.5 mins.** (new cassettes)
- 3b. Tree Thinning/Slash Pile Building: **7.5 mins.** chainsaw and piling, switch, repeat for **7.5 mins.** (new cassettes)
- 3c. Tree Stand Examination: increment core tree, measure diameter with D-tape, determine height with clinometers from 15 m away from tree. Duplicate, simultaneous activities, several trees, **30 mins.** (new cassettes)
- 3d. Cutting Fireline by Hand using Pulaski **7.5 mins.**, 10 feet apart, switch, repeat for **7.5 mins.** (new cassettes)
- 3e. Cutting Fireline by Dozer: **30 mins.** of dozing, other person 100 feet away, clearing debris, simulating guiding dozer (new cassettes). Do not switch operator and dozer boss. (Late season).

Libby OU3 Revised/Improved Phase IV ABS FSDS

John Garr

to:

Bob Medler, Bob Marriam, Bonita Lavelle

07/28/2010 09:28 AM

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Greetings:

Attached is what we believe to be an improved and easier-to-use FSDS for Phase IV ABS activities, based on field experience over the first two rounds. Our suggested changes include:

Removed rotameter entry fields. Because Phase IV has only one team working at a time and only one BIOS primary calibrator, the team always has a BIOS aboard (during Phase III, the two teams shared the BIOS to calibrate their rotameters). The BIOS flow rate readings are much more accurate/precise and automatically adjust to atmospheric conditions (rotameters drift with atmospheric conditions, and require constant corrections, which compromises accuracy and complicates volume calculations). I believe rotameters are fine for indoor work under relatively constant conditions, but we've found they are poor performers in the field. Note: During his Round 1 oversight, Sean Everett of HDR was in agreement that the BIOS was superior, despite taking a bit longer than using the rotameter.

Added fields for activity "Start" and "Stop" GPS locations; added "N 48" and "W 115" to the GPS location fields (all our locations are within 48 degrees N and 115 degrees W). Our handheld GPS records to 100,000ths of a degree, so these positions can easily be converted to UTM or other desired location system.

These changes will make entries simpler and cleaner and will result in more complete and legible documents. If you have any questions, comments, or suggestions, please do not hesitate to contact me. We would like to begin using the revised FSDS beginning with the August 2, 2010 round.

Thanks,

John



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John D. Garr, P.G.

Supervising Hydrogeologist

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Sample Condition: COCs 7-9

Kyeong Corbin

to:

'Marriam, Robert R.', Bonita Lavelle, John Garr

07/28/2010 02:38 PM

Please respond to kyeong.corbin

Show Details

The following group of samples cannot be analyzed directly due to dusty/overloaded conditon.

A group of P4-00083, P4-00084 and P4-00085

A group of P4-00086, P4-00087 and P4-00088

A group of P4-00092, P4-00093 and P4-00094

A group of P4-00099, P4-00100 and P4-00101

We will go ahead and process the rest of the samples. If you have any questions, please give me a call.

Kyeong Corbin | QA Officer/TEM Laboratory Supervisor
ATC Associates Inc. | Hygeia Laboratories, Inc.

82 West Sierra Madre Blvd. | Sierra Madre, CA 91024

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